

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

BROADVISION, INC.,  GENERAL ELECTRIC COMPANY and THE MEDICAL PROTECTIVE COMPANY,	----- x : Plaintiff, : - against - : GENERAL ELECTRIC COMPANY and THE MEDICAL PROTECTIVE COMPANY, : Defendants. : ----- x	: : ECF Case : <b><u>JOINT DISCOVERY</u></b> <b><u>PLAN REPORT</u></b>
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Pursuant to the Court's instructions at the initial conference on April 29, 2008, the parties, by their undersigned counsel, submit the following report outlining their discovery plan pursuant to Fed. R. Civ. P. 26(f):

- A. The parties shall serve initial disclosures required by Fed. R. Civ. P. 26(a)(1) on or before June 13, 2008. The parties do not request changes in the timing, form or requirements of said disclosures.
- B. The last date to join additional parties shall be August 15, 2008.
- C. The last date to serve amended pleadings shall be September 12, 2008.
- D. The last date to complete fact discovery shall be January 16, 2009. The parties do not currently see a need to have discovery conducted in phases or limited to or focused upon particular issues, except that the parties believe that expert discovery, if any, should follow fact discovery. The parties do not currently see a need to make changes in the limitations on discovery imposed under the Fed. R. Civ. P. or the local rules of this Court.

E. Expert reports, if any, on issues on which a party has the burden of proof shall be served on or before February 13, 2009.

F. Rebuttal expert reports, if any, shall be served on or before March 13, 2009.

G. Expert depositions, if any, shall be completed on or before April 3, 2009.

H. Dispositive motions shall be served on or before April 24, 2009.

I. The Joint Pre-Trial Order shall be submitted within thirty (30) days of the close of all discovery if no dispositive motions are filed, otherwise within thirty (30) days after all dispositive motions are decided.

J. The parties do not have any current views or proposals relating to disclosure or discovery of electronically stored information and are hopeful that they will be able to work out any issues relating to electronic discovery as and when they arise.

K. The parties anticipate that they will ask the Court to enter a Confidentiality Stipulation and Protective Order conforming to this Court's Individual Practices providing for protection of confidential and proprietary information produced in discovery, and providing generally that material produced in discovery in this action shall be used solely for the prosecution or defense of this action.

Dated: New York, New York  
May 15, 2008

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